UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA Criminal No. 20-203 (PAM/KMM)

Plaintiff,

MOTION TO DISCLOSE GOVERNMENT'S INTENT TO INTRODUCE ANY RULE 404(b) EVIDENCE

vs.

Francisco Manuel Rodriguez Valenzuela,

Defendant.

Defendant Francisco Manuel Rodriguez Valenzuela, by and through his attorney, Steven J. Wright, respectfully moves the Court for an order requiring the government to provide Defendant with notice of its intent to introduce any evidence of other crimes, wrongs, or bad acts allegedly committed by Defendant, codefendants, or any alleged co-conspirator. Fed. R. Evid. 404(b).

Defendant is requesting immediate disclosure of the 404(b) evidence to enable defense counsel an opportunity to investigate and properly defend.

Dated: October 13, 2020 Respectfully submitted,

/s/ Steven J. Wright Minnesota Attorney #387336 331 Second Ave South, Ste 705 Minneapolis, MN 55401 (612) 669-8280

ATTORNEY FOR DEFENDANT